



COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY



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November 21, 2014

Mr. Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
Via email CEQA.Guidelines@ceres.ca.gov

Re: CEQA Guidelines and Potential Replacement Metric for Level of Service

Dear Mr. Calfee:

The Riverside County Transportation and Land Management Agency (TLMA) appreciates the opportunity to comment on the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (Steinberg, 2013). We also support the comments made in the letter provided by the Riverside County Transportation Commission (RCTC) on November 20, 2014 on behalf of all of the cities and the County of Riverside.

Riverside County is one of the largest counties in California, spanning from the Greater Los Angeles area to the Arizona border. The unincorporated County contains a variety of distinctive communities including densely populated areas that surround our City urban centers, suburban communities, and rural areas. The County TLMA is tasked with overseeing development review within the unincorporated County, and the operation and improvement of 2,100 miles of County roads covering the 7,300 square miles of the County. Many of the major roads in the unincorporated County link incorporated cities and serve as the backbone of our County-wide transportation system, supplementing our limited number of State Highways. The County's backbone road system is still in the mid-stage of its development; many of our backbone arterial roads are still two-lane roads which are in need of expansion in order to improve safety and provide basic infrastructure to serve a growing population. Given the need to achieve a basic level of road infrastructure that already exists in the surrounding Los Angeles, Orange County, and San Diego metropolitan areas, we offer the following comments for your consideration:

1. The proposed use of vehicle miles travelled (VMT) to entirely replace the traditional level of service based on delay should first be carefully implemented, analyzed, and monitored as a pilot program in existing Transit Priority Areas (TPA's) before it is rolled out as the exclusive Statewide measurement criteria by January 1, 2016 as currently proposed. The implementation of a multi-year pilot program in TPA's would allow for the necessary testing and vetting of this criteria in real-life conditions within areas that have the road and transit infrastructure in place to adequately assess the ramifications of such a major change, and to make any necessary adjustments given actual history of implementation before they are implemented at a State-wide level.

2. The unincorporated communities of Riverside County mostly lack a completed backbone road infrastructure network and the population density necessary to effectively operate a transit system, and a dense network of sidewalks and bicycle lanes that provide connectivity from housing areas to transit routes. The premise articulated in Section 15064.3 (b)(2) that every project that adds general purpose highway or arterial lane miles may create a significant impact appears to actually be counterproductive to achieving the goals of the legislation to create a true multimodal network, since a successful transit network requires a backbone road network of sufficient density to operate effectively. Creating an adequate backbone network would, in certain cases, also have the effect of reducing VMT by providing alternatives that reduce distance between the origin and destination of each trip.
3. Senate Bill 743 suggests the use of the Metropolitan Planning Organization (MPO) travel demand model (i.e. Southern California Association of Governments (SCAG) model) to determine the regional average VMT per capita in order to establish thresholds of significance under CEQA. SCAG is the largest MPO in the United States, spanning over 18 million people within 38,000 square miles. Los Angeles County alone consists of more than half the population in just over one tenth of the geographic area (4,083 square miles), which greatly skews the regional average. As a result, the use of VMT/capita average within the SCAG model may result in public infrastructure and development projects within Riverside County often exceeding this threshold, while projects in urbanized areas such as Los Angeles County will rarely surpass the threshold.

At such future time that it may be appropriate to gradually expand the use of VMT methodology outside of TPA's, it is requested that flexibility be provided at the subregional level for Counties and other jurisdictions to adopt standards that acknowledge the limitations of their built environment, and take into account their size, population density, and job demographics. There is a significant need to allow jurisdictions to adopt VMT targets at the sub-regional level in recognition of the starkly different demographic and geographic conditions within each broad MPO area.

4. Traffic safety is of paramount priority when developing guidelines for transportation systems. Section 15064.3 (3) – Local Safety - identifies that a lead agency may also consider localized effects of project-related transportation on safety, Examples listed include increased exposure of bicyclists and pedestrians in vehicle conflict areas, queuing on freeway off-ramps, speed differentials of greater than 15 miles per hour between adjacent lanes, increased speeds, or increased safety between pedestrian or bicycle crossings.

It is requested that this section be modified to affirmatively state that “examples also may include, but not be limited to: improvements on roads with high collision rates, where the lead agency determines that road widening will be the most effective measure to reduce collisions; at intersections where additional lanes may improve safety by reducing collisions attributed to long queues; the addition of turn lanes to safely separate traffic streams; or in instances where separating significant truck traffic from non-truck traffic may improve safety”. It is requested

that this section overall be clarified to allow local agencies discretion in determining what constitutes safety projects, since that determination may vary significantly across the State.

5. It is requested that the proposed CEQA guidelines take into account the need to balance transportation impacts with other goals promulgated by the State to enhance quality of life, such as adequate housing stock, improved air quality, economic development, and renewable energy. Several rural areas within Riverside County contain economically disadvantaged communities which experience high unemployment, substandard infrastructure, and an inadequate housing stock which is in need of upgrade. Paving dirt roads in these areas would improve air quality, increase safety, and tremendously enhance quality of life. The building of adequate housing and employment opportunities in these areas will necessitate the addition of road lanes. Similarly, implementation of a renewable energy project in remote areas may necessitate supporting roadway infrastructure to build and maintain it. However, the CEQA analysis could potentially require EIR's, absent any other significant impact, based on the threshold methodologies being proposed. Improvements to these areas could be delayed as a result or become cost-prohibitive to implement. It is requested that the guidelines acknowledge the ability of lead agencies to balance these priorities.

Thank you for the opportunity to provide input into OPR's process for updating CEQA guidelines. We look forward to engaging in a continued dialogue as the effort progresses.

Sincerely,



Juan C. Perez
Director of Transportation and Land Management

cc: Board of Supervisors
Jay E. Orr, County CEO